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OFFICE OF THE EXECUTIVE SECRETARY September 22, 2000

## By Hand

David Waddell Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243

Re:

Tariff of BellSouth Telecommunications, Inc. to Reduce Grouping Rates in Rate Group 5 and to Implement a 3% Late Payment Charge

Docket No. 00-00041

Dear Mr. Waddell:

Enclosed for filing in the above-captioned proceeding are an original and thirteen copies of AT&T's Filing in support of BellSouth's Response to the Consumer Advocate Division to Modify Protective Order or Change the Classification of Documents Marked Confidential.

If you have questions, please call me.

Sincerely,

Jim Lamoureux

Encls.



## BEFORE THE TENNESSEE REGULATORY AUTHORITY

Nashville, Tennessee

In Re: Tariff of BellSouth	)	
Telecommunications, Inc. to Reduce	)	
Grouping Rates in Rate Group 5 and	)	Docket No. 00-00041
to Implement a 3% Late Payment Charge	)	
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## AT&T'S FILING IN SUPPORT OF BELLSOUTH'S RESPONSE TO THE CONSUMER ADVOCATE DIVISION'S MOTION TO MODIFY PROTECTIVE ORDER OR CHANGE THE CLASSIFICATION OF DOCUMENTS MARKED CONFIDENTIAL

On August 25, 2000, the Consumer Advocate Division ("CAD") filed a Motion to Modify Protective Order or Change the Classification of Documents Marked Confidential in the above-referenced proceeding. On August 28, 2000, BellSouth filed a Response to the CAD's Motion requesting that the Motion be denied. Although AT&T is not a party to this particular proceeding, modifications to the classification of confidential documents would seriously compromise AT&T's interests with regard to billing and collection activities. AT&T therefore supports BellSouth's filing and requests that the TRA deny the CAD's Motion.

Each of AT&T's operating agreements contains unique protections and documentation pertinent only to the billing processes of the Regional Bell Operating Company with which the contract is in effect. AT&T considers such agreements to be proprietary, confidential commercial information and maintains such documents as confidential information. Such agreements are not customarily disclosed. AT&T currently has an agreement with BellSouth in Tennessee, entitled, "Agreement for the Provision of the Billing and Collections Services

between BellSouth Telecommunications" dated December 14, 1995. This agreement contains financial and non-financial detail negotiations, and reclassifying the confidentiality of this agreement would compromise AT&T's billing and collection processes moving forward. AT&T will need to negotiate future agreements will BellSouth. If all such agreements become public record, AT&T may loose whatever competitive advantage it currently has with what it has negotiated to date. The agreement is for competitive services that BellSouth provides to AT&T through business-to-business negotiations, given AT&T's unique needs. The CAD has filed no clear justification, or delineated any public interest that would be served by making public such agreements. Moreover, there is no need for such agreements to be made public in order for the CAD to pursue its interests in this proceeding.

Therefore, AT&T requests that the confidentiality of this agreement remain as such.

Respectfully submitted,

Jim Lamoureux

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